

Waste Isolation Pilot Plant
Class 3 Permit Modification Request
June 2005

ATTACHMENT B5		
Section	Change	Explanation of Change
Permit Attachment B5	Changed “characterization” to “waste analysis” and “characterize” to “analyze.”	Modified for consistency with NMAC language in 20.4.1.500 NMAC (incorporating 40 CFR §264.13).
B5-1	The Permittees shall ensure that prior to the implementation of characterization <u>waste analysis</u> activities at participating sites, standard operating procedures (SOPs) were developed for all activities which affect the quality of the waste characterization <u>analysis</u> program <u>elements specified in the WAP</u> .	Modified for consistency with NMAC language in 20.4.1.500 NMAC (incorporating 40 CFR §264.13). Editorial to clarify that only waste analysis program elements specified in the WAP need SOPs.
B5-1	Site-specific SOPs <u>related to sampling and analysis</u> will be reviewed for consistency with the QAPjP according to the Permittees' Audit and Surveillance Program specified in Permit Attachment B6.	To clarify that the two elements of waste analysis program requiring site-specific SOPs are related to sampling and analysis since the generator/storage sites will be required to perform representative sampling and analysis if the AK information is not sufficient. Since information specific to radiography and VE methods for waste analysis has been removed, the generator/storage sites are no longer required to develop SOPs related to radiography and VE. The justification for this change is provided in Section 1.2.1 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix.
B5-2	The Permittees shall ensure that the preparation, issuance, and change to documents that specify quality requirements or prescribe activities affecting quality for the transuranic mixed waste characterization <u>analysis</u> program <u>activities specified in the WAP</u> be controlled to assure that correct and current documents are used and referenced.	Deletion is editorial. Editorial to clarify that only waste <u>characterization analysis</u> program elements specified in the WAP need SOPs.
B5-2	The Permittees shall provide the QAPjP for each site and all revisions to NMED upon approval by the Permittees.	Deletion is editorial since the sentence was moved to the next paragraph (last paragraph) of Section B5-2.
B5-2	<u>Prior to shipment of TRU mixed waste, the Permittees shall provide the approved QAPjP for each site, and all approved revisions, to the New Mexico Environment Department.</u>	Editorial to clarify that the Permittees must provide the QAPjP for each site and all revisions to NMED, upon approval by the Permittees, prior to shipment of TRU mixed waste.